

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

- - - - - X  
:  
UNITED STATES OF AMERICA, :  
:  
- v. - :  
:  
RAMEL WILLIAMS, :  
:  
Defendant. :  
:  
- - - - - X

INDICTMENT

08 CRIM. 07 07

COUNT ONE

The Grand Jury charges:

1. On or about June 27, 2008, in the Southern District of New York, RAMEL WILLIAMS, the defendant, unlawfully, intentionally, and knowingly did possess with intent to distribute a schedule I controlled substance, to wit, heroin.

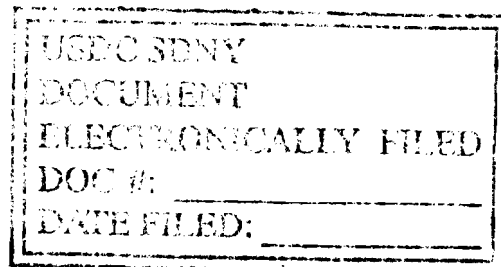
(Title 21, United States Code, Sections 812, 841(a)(1) and  
841(b)(1)(C).)

COUNT TWO

The Grand Jury further charges:

2. On or about June 27, 2008, in the Southern District of New York, RAMEL WILLIAMS, the defendant, unlawfully, intentionally, and knowingly did possess with intent to distribute a schedule I controlled substance, to wit, MDMA, commonly known as "ecstasy."

(Title 21, United States Code, Sections 812, 841(a)(1) and  
841(b)(1)(C).)



COUNT THREE

The Grand Jury further charges:

3. On or about June 27, 2008, in the Southern District of New York, RAMEL WILLIAMS, the defendant, having been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, unlawfully, willfully, and knowingly, did possess in and affecting commerce a firearm, to wit, two (2) Mossberg Model 500A 12-gauge pump shotguns and one (1) Heckler & Koch Model USP 45-caliber semi-automatic pistol, which previously had been shipped and transported in interstate and foreign commerce.

(Title 18, United States Code, Section 922(g)(1).)

COUNT FOUR

The Grand Jury further charges:

4. On or about June 27, 2008, in the Southern District of New York, RAMEL WILLIAMS, the defendant, unlawfully, willfully and knowingly, used and carried a firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the drug trafficking crimes charged in Counts One and Two of this Indictment, and in furtherance of such crimes possessed a firearm, to wit, two (2) Mossberg Model 500A 12-gauge pump shotguns and one (1) Heckler & Koch Model USP 45-caliber

semi-automatic pistol.

(Title 18, United States Code, Section 924(c)(1)(A)(i).)

FORFEITURE ALLEGATION

5. As a result of committing one or more of the controlled substance offenses alleged in Counts One and Two of this Indictment, RAMEL WILLIAMS, the defendant, shall forfeit to the United States pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the said defendant obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts One and Two of this Indictment.

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

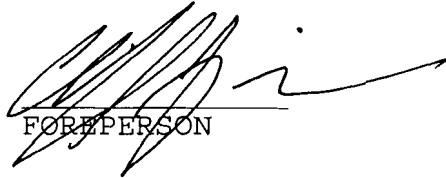
c. has been placed beyond the jurisdiction of the Court;

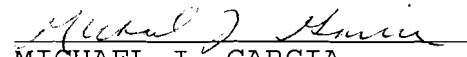
d. has been substantially diminished in value;  
or

e. has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the

United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841(a)(1), 841(b)(1),  
and 853.)

  
FOREPERSON

  
MICHAEL J. GARCIA  
United States Attorney